

February 22, 2019

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

RE: WaveDivision Holdings, LLC (826028)  
Astound Broadband, LLC (825683)

**Annual CPNI Compliance Certification, EB Docket No. 06-36**

Dear Secretary Dortch:

Attached for filing in EB Docket No.06-36, please find the Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate and accompanying statement of WaveDivision Holdings, LLC and Astound Broadband, LLC.

If there are questions regarding this filing please contact the undersigned. Thank you for your assistance.

Sincerely,

WaveDivision Holdings, LLC and Astound Broadband, LLC



Jeffrey B. Kramp

Senior Vice President, General Counsel & Corporate Secretary



**Annual 17 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification covering the prior calendar year: **2018**

Date filed: **February 22, 2019**

Name of company covered by this certification: WaveDivision Holdings, LLC (826028)  
Astound Broadband, LLC (825683)

Form 499 Filer ID: 826028, 825683

Name of signatory: Jeffrey B. Kramp

Title of signatory: SVP, General Counsel and Corporate Secretary

I, Jeffrey B. Kramp , certify that I am an officer of the company named above and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under title 18 of the U.S. code and may subject it to enforcement action.

Signed:  \_\_\_\_\_

Attachment: Accompanying Statement explaining CPNI procedures

**Attachment to Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification**

**EB Docket No. 06-36**

**Statement Regarding CPNI Operating Procedures**

The CPNI Operating Procedures of WaveDivision Holdings, LLC (“Wave”) on behalf Wave subsidiaries and telecommunications carriers WaveDivision I, LLC, WaveDivision II, LLC, WaveDivision III, LLC, Cedar Communications, LLC, WaveDivision IV, LLC, Wave/Powers Acquisition, LLC, Astound Broadband, LLC, Wave Business Solutions, LLC, and WaveDivision VII, LLC (collectively, the “Wave Subsidiaries”), ensure that Wave and the Wave Subsidiaries are and will be in compliance with 47 U.S.C. 222 and the rules contained in Title 47, Chapter 1, Subchapter B. Part 64, Subpart U of the Code of Federal Regulations, 47 C.F.R. § 64.2001 *et seq.* of the commission’s rules. All of Wave’s CPNI Operating Procedures are the Operating Procedures of any and all Wave Subsidiaries. Included among the provisions of Wave’s CPNI Operating Procedures are:

- A requirement that Wave have at all times a CPNI Compliance Officer to supervise the implementation of Wave’s CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI, in compliance with § 64.2010.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI, in compliance with § 64.2007. In those instances in which customer approval is required for use of CPNI, Wave obtains approval through verbal, written, or electronic methods in compliance with § 64.2007.
- Detailed procedures for obtaining opt-out and opt-in approval from customers. For one-time use of CPNI on inbound and outbound customer telephone contacts for the duration of the call, Wave representatives obtain verbal consent from the customer pursuant to the Commission’s rules.
- A requirement that the billing system records for customers’ accounts allow the status of customers’ CPNI approval to be easily ascertained prior to the use of CPNI, in compliance with § 64.2009.
- A requirement for supervisory approval for all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns, in compliance with § 64.2009.
- A requirement that personnel be trained to identify what customer information is CPNI, as defined in § 64.2003, and that personnel be trained as to when they are and are not authorized to use CPNI, in compliance with § 64.2009.
- A written disciplinary process for misuse of CPNI, in compliance with § 64.2009.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI, in compliance with § 64.2011.

Wave and the Wave Subsidiaries were not required to take action against any data brokers in 2018, nor did Wave or any of the Wave Subsidiaries receive any customer complaints based on unauthorized release of CPNI in 2018.